



April 8, 2024

Hon. Karoline Mehalchik, U.S.D.J.
William J. Nealon Federal Bldg. & U.S. Courthouse
235 N. Washington Avenue
Scranton, PA 18503

Via ECF

Re: *Carter v. Dauphin County, et al.*, 23-cv-1867

Your Honor:

As of this morning, I now represent Plaintiff in the above-captioned matter. I am aware that there is currently a deadline of tomorrow, April 9, for Plaintiff to file a response in opposition to defendants' motions to dismiss, or to file an amended complaint proposed by her prior counsel.

I am respectfully requesting a stay of the current deadlines in this case. I've not yet received the file Plaintiff's prior counsel. I do not believe it is appropriate or proper to sign my name to a complaint I did not draft, particularly when I've not had the benefit of reviewing the full file such that any signature would comply with Rule 11. Moreover, I've not yet heard back from Plaintiff's prior attorneys, other than to arrange the substitution of counsel that was filed today, to arrange for the transfer of the file. And it is otherwise infeasible to prepare responses to the motions to dismiss to be filed tomorrow. Attorney Ninosky does not object to this request, and as of the submission of this letter I've (understandably) not heard Attorney Lavery's response.

Unless directed otherwise, I will plan to advise the Court and opposing counsel of the status of my progress in obtaining (which is not entirely within my control) and reviewing the file in two weeks.

Very respectfully,

/s/ Christopher Markos



*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

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